

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,  
STATE OF CALIFORNIA, STATE OF  
COLORADO, STATE OF ILLINOIS,  
STATE OF INDIANA, STATE OF IOWA,  
STATE OF MINNESOTA, STATE OF  
NEBRASKA, STATE OF OREGON,  
STATE OF TENNESSEE, STATE OF  
TEXAS, STATE OF WASHINGTON, and  
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC,  
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**REPLY DECLARATION OF  
ALLYSON M. MALTAS IN  
SUPPORT OF PLAINTIFFS'  
MOTION TO COMPEL  
DISCOVERY OF SYNGENTA  
DEFENDANTS**

**[PUBLIC VERSION]**

I, Allyson M. Maltas, do hereby declare and state as follows:

1. I am an active member in good standing of the bar of the District of Columbia. I am a Senior Trial Counsel in the Bureau of Competition of the Federal Trade Commission ("FTC"), an agency of the United States Government, and I am representing the FTC in the above-captioned action. I have personal knowledge of the matters set forth in this Declaration.

2. I respectfully submit this Reply Declaration In Support of Plaintiffs' Motion To Compel Discovery of Syngenta Defendants.

3. Attached as Exhibit AB is a true and correct copy of *The Public Institution for Social Security v. Al Wazzan*, [2023] EWHC 1065 (Comm), obtained from <https://www.bailii.org/ew/cases/EWHC/Comm/2023/1065.html>.

4. Attached as Exhibit AC is a true and correct copy of the Swiss Federal Supreme Court's decision in the *Swisspartners* case, 6B\_216/2020 (Nov. 1, 2021), obtained from [https://www.bger.ch/ext/eurospider/live/de/php/aza/http/index.php?highlight\\_docid=aza%3A%2F%2Faza%3A%2F01-11-2021-6B\\_216-2020&lang=de&zoom=&type=show\\_document](https://www.bger.ch/ext/eurospider/live/de/php/aza/http/index.php?highlight_docid=aza%3A%2F%2Faza%3A%2F01-11-2021-6B_216-2020&lang=de&zoom=&type=show_document).

Executed on July 29, 2024.

/s/ Allyson M. Maltas

ALLYSON M. MALTAS  
Senior Trial Counsel  
Federal Trade Commission  
Bureau of Competition  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Telephone: (202) 326-3646  
Email: [amaltas@ftc.gov](mailto:amaltas@ftc.gov)